

**Department of
Conservation &
Development**

Community Development Division

County Administration Building
651 Pine Street
North Wing, Fourth Floor
Martinez, CA 94553-1229

Phone: (925) 335-1201

**Contra
Costa
County**



Catherine O. Kutsuris
Director

Margit Aramburu
Director
Natural Resources Institute
University of the Pacific
(via email to margithind@comcast.net)

July 5, 2011

Dear Margit:

Thank you for the opportunity to provide additional comments on the *Administrative Draft Economic Sustainability Plan* that was presented to the Delta Protection Commission on June 23, 2011 at the Port of Stockton.

The draft plan reflects a great deal of research that undoubtedly was performed and written up in a very short timeframe. I appreciate the considerable effort that has gone into the draft document thus far.

By way of this letter I am providing comments that reflect additional input from Commissioner Mary Piepho and several Contra Costa County staff members, including me. Some of these comments were not made at the DPC meeting, so they should be considered as additional input. Some of the comments provide more detail on verbal comments that were made at the meeting.

I hope this additional input is helpful as you continue your work on the plan.

If you have any questions about these comments, please contact me at your convenience and I will be glad to discuss them with you. You can reach me at (925) 335-1201 or john.greitzer@dcd.cccounty.us.

General comments on the *Administrative Draft Economic Sustainability Plan*

1) In instances where quantitative statements are made about the Delta and its characteristics, there should be references or sources cited. Later in this letter we cite a few specific examples, but this comment applies throughout the document.

2) There are several instances in which a previous study or finding is described as "deceptive," "misleading," or "biased," among other terms. The consultant team has done a thorough job reviewing these previous studies, as you were asked to do, but we suggest your critique of these previous studies stick to facts rather than use judgemental language. The use of such terms implies to some readers that there was intentional deception in the previous studies, and it will likely lead people to dismiss the *Economic Sustainability Plan* as an opinion piece rather than a plan. More detail on this is provided later in this letter.

3) The document contains numerous graphics that were taken from other documents. In most cases, these graphics are difficult to read either because the font became too small when they were reproduced in a smaller size, or because the reproduction quality is poor. We ask that the consultant team pay particular attention to the graphics to ensure they are legible in the final document, because these graphics will be helpful in understanding the analysis presented in the plan.

Chapter 4, Flood Control and Public Safety

4) Figure 7 on page 34 shows project levees and non-project urban and non-urban levees. It is unclear where the information came from to designate the various levees as urban or non-urban. The criteria used for determining urban and non-urban should be included and the agency that prepared the information should be cited.

5) Similar to Figure 7, there should be a map showing which levees should provide urban protection (e.g. Isleton). Perhaps Figure X2, referred to on page 40, will provide this information.

6) Figures 9 and 10 on page 37 are very difficult to read because the font is too small. You might consider breaking this into two pages, one figure per page, to allow for a larger font size.

7) On page 41, under "Levees Bordering the Deep-water Ship Channels," there is a statement that the deep-water ship channels to the ports generally have negative effects on the Delta ecosystem, along with the important contributions they make. The document should indicate what those negative effects are, and provide a source reference for the information.

8) Section 1.3.2 (page 48) asserts that Delta levees are in good condition even during high storm flows if it is assumed there are upstream releases or levee breaks. This is one of several instances in which the plan asserts that the levees aren't as bad as everyone says they are. However, relying on upstream levee breaks is not a reliable strategy for preventing flooding in the Delta, unless upstream releases are part of the plan. If this is the intention, the plan must specify where the released upstream water will flow to.

9) Section 1.3.4 (page 49) provides a good overview and questions some of the conclusions from prior studies. This is one of several examples in the plan where other studies are discussed and their conclusions questioned. Sometimes these discussions cite specific figures or information from another report, such as this section on earthquake vulnerability. Sometimes, however, the discussion is much vaguer. The *Economic Sustainability Plan* would benefit from reference citations for all of the prior reports that are described.

10) There is a discussion on pages 51 and 52 about a standards approach versus a risk-based approach for prioritizing levee investments. As far as we are aware, most agencies that control grant funds are using or migrating to a risk-based approach to prioritization of grant funding.

11) On page 56, in the first paragraph, there is a reference to a “deceptive presentation” made by USGS personnel at a meeting of the Delta Stewardship Council. We suggest that the *Economic Sustainability Plan* should avoid the use of confrontational or accusatory language, as it will reduce the credibility of the plan. Given that the consultant team was asked to review prior research, it is fair enough to take issue with the findings or conclusions of the prior work but this should be based on facts or methodology rather than stating or implying there was deliberate deception involved. See comment # 13 for more on this.

12) The cost to upgrade all Delta levees (pages 63 and 64) is estimated to be \$1-\$2 billion. The document refers to another estimate from a different source at \$50 billion. The source of the \$50 billion estimates should be cited and the assumptions discussed so there can be a true comparison between these two vastly different estimates. If time and resources permit, it would be helpful to have this huge difference in cost estimates be reviewed by an independent third party.

Chapter 5, Review of Economics in Influential Delta Studies

13) On page 65, the two bullet-point sentences should be softened in terms of the wording used to express them. As mentioned in our general comments at the beginning of this letter, we ask that the consultant team avoid the use of terms such as “bias in favor of peripheral canal.” Such bias may or may not have been the intent with these earlier studies, but if the *Economic Sustainability Plan* uses such language, it will be dismissed as biased itself. As an example of good critique wording, please refer to item #1 under the first bullet point on page 65. This item notes that a prior study “does not utilize the conventional, scientifically accepted present discounted value approach to evaluating investments.” This provides a critical review without using harsh language. We ask that this approach be followed throughout the chapter.

Chapter 6, Framework for Analysis

14) The analysis described in this chapter focuses on the large-capacity peripheral tunnel that was the focus of the Bay-Delta Conservation Plan (BDCP) in 2010. As you know, there have been changes to the BDCP process in terms of both its structure and the range of alternatives that will be analyzed in the environmental review of the BDCP. While the *Economic Sustainability Plan* acknowledges this at the bottom of page 73, we suggest the wording also be changed on page 72 in the first paragraph of the “Isolated Conveyance Scenario” section. Rather than describing the large-capacity tunnel as the “leading proposal” for an isolated conveyance facility, we suggest describing it as the “most detailed” proposal available at the time the consultant team did its research.

15) In Chapter 7, “Agriculture,” there should be a reference to Contra Costa County’s Farm Stand Ordinance, which took effect in July 2007. The ordinance (actually an amendment to the County’s previous farm stand ordinance) allows farmers to establish larger stands and offers more flexibility in the kinds of products they can sell. These amendments were made to help Contra Costa farmers be competitive and profitable enough to resist pressure to sell their land to developers.

16) Chapter 7 also should include a discussion of agricultural tourism, as it is vital to the Legacy Communities in the Delta.

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Chapter 7, Agriculture

- 17) On page 80, in Table 5, there is a reference to pastureland. We suggest this term be defined.
- 18) On page 81, under the heading "Harvested Acreage and Crop Allocation," there is a statement that the analysis excluded grazing land. There should be an explanation as to why this category was not analyzed.
- 19) The maps in Figure 15 and Figure 16 appear to be missing the data for much of Contra Costa County, particularly Figure 16.
- 20) Table 13 on page 91 forecasts the changes in crop distribution and crop revenues that would result from substantial increases in salinity in the Delta. It would be helpful to extend this analysis further into the future to provide forecasts of the long-term impacts of salinity increases. This would help us understand if the Delta would ever be able to recover from such changes in salinity, and if so, how long it would take.
- 21) On page 92, the paragraph of text uses the term "pastureland and rangeland." It would be helpful to define the difference between these two terms.

Chapter 12, Legacy Communities

- 22) Page 148 discusses Legacy Communities and specifically mentions Clarksburg and Walnut Grove/Locke. Previous discussions with the Delta Protection Commission have mentioned the unincorporated community of Knightsen in Contra Costa County as a potential Legacy Community. Knightsen should be included as one of the Legacy Communities discussed in this chapter.
- 23) Consistent with comment # 22 above, Knightsen should be added to the list of "Other Legacy Communities" in section 1.3 on page 170.

Thank you again for the opportunity to provide these comments.

Sincerely,



John Greitzer
Contra Costa County Water Agency
Department of Conservation & Development

- C: Supervisor Mary Piepho, DPC Representative
K. Basting, District III Supervisor's Chief of Staff
Supervisor Karen Mitchoff, DPC Alternate Representative
C. Glickman, District IV Supervisor's Chief of Staff
M. Avalon, Contra Costa County Flood Control District
S. Goetz, Deputy Director—Conservation & Transportation Planning Programs
M. Machado, Executive Director, Delta Protection Commission